

# EXHIBIT 58

Case 1:18-cv-05391-SCJ Document 451-58 Filed 06/29/20 Page 2 of 3

**To:** Vasu Abhiraman [REDACTED]@fairfightaction.com]  
**From:** Whitney McGinniss  
**Sent:** Thur 5/9/2019 9:14:03 PM UTC  
**Subject:** Re: McGinniss Voting Documents  
McGinniss Declaration - Fair Fight - wmedits.docx

Attached. I'm a bit picky, so I made lots of edits. If you don't like any of them, feel free to change them or take them out. I'm sure we will hit on a version we both agree with. Thanks!

On Thu, May 9, 2019 at 12:03 PM Vasu Abhiraman [REDACTED]@fairfightaction.com> wrote:

No worries Whitney, life happens! Look forward to it, thanks a billion 💎

Kindness,

Vasu

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**From:** Whitney McGinniss [REDACTED]  
**Sent:** Tuesday, May 7, 2019 11:40:18 PM  
**To:** Vasu Abhiraman  
**Subject:** Re: McGinniss Voting Documents

Hey - Just wanted to check in and let you know that (a) I have NOT forgotten about this but (B) I'm not going to be able to have it to you by COB tomorrow. I will shoot for Thursday. If not, I will DEFINITELY have this done by Friday. It is a priority, my life is just a tad crazy this week. Sorry!!

On Wed, May 1, 2019 at 1:54 PM Vasu Abhiraman [REDACTED]@fairfightaction.com> wrote:

Hi Whitney, Vasu here. How are you? Happy Wednesday!

Thank you so much for this. Attached is a rough draft of your statement. Couple things to address:

- 1) We want these statements to narrate as deeply personal, compelling stories illustrating disenfranchisement and its unacceptability. Your statement has so many details, and all of them are important. Some of the details missing in this rough draft: how you got in contact with the ACLU, with the media etc. Those details are important as well.
- 2) We could possibly use further documentation for Exhibits here: including screenshots of select emails, etc.

Given that your statement is so personal and so detailed, we're thinking it can be one of the very strongest in our case to illustrate the broken election system. Wondering if you wouldn't mind editing it a bit yourself: adding as many details as you can, even adding exhibits if you'd like, etc.

Kind of thinking out loud here, let me know if this works for you. I'm always just a phone call or an email away: [REDACTED]  
[REDACTED] Thanks Whitney!!

Kindness,

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**From:** Whitney McGinniss [REDACTED]

**Sent:** Wednesday, May 1, 2019 9:23 AM

**To:** Vasu Abhiraman

**Subject:** McGinniss Voting Documents

Hey Vasu,

Sorry for the delay! Here is a copy of my absentee ballot application as well as the photos I took sending my absentee ballot back in. I didn't include any that show the ballot itself, although I have one of those as well.

Let me know if you need anything else. Again, I apologize for the delay.

Thanks!

Whitney